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BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS SUSAN W. NEEDHAM  
(OCA/USPS-T7-21-27)  
(July 23, 1996)

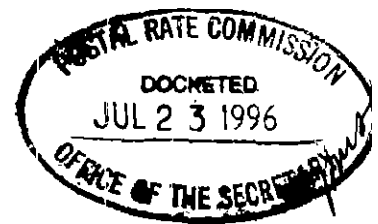
Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

Respectfully submitted,

*Gail Willette*

GAIL WILLETTE  
Director  
Office of the Consumer Advocate

*Shelley Dreifuss*  
SHELLEY DREIFUSS  
Attorney



OCA/USPS-T7-21. Refer to page 25, lines 6-8, of your testimony. Please confirm that the additional revenue from the non-resident fee will be sufficient to alleviate the problems caused by non-resident box service customers.

- a. If you do not confirm, please provide the box rates that would be sufficient.
- b. If you do not confirm, please provide the amount of additional revenue necessary to alleviate the problems.

OCA/USPS-T7-22. Refer to page 25, lines 6-8, of your testimony where it states that, "the additional revenue from non-residents would provide funds for expansion of box service where appropriate." Please confirm that the additional revenue from non-resident box customers will be used to install more post office boxes.

- a. If you do not confirm, please explain to what use the additional revenue will be put.
- b. If you do confirm, please provide a copy of the plan "for expansion of box service where appropriate."

OCA/USPS-T7-23. Refer to pages 17-25 of your testimony concerning post office box fees.

- a. Please confirm that the current post office box fees are insufficient to cover the cost of providing box service. If you do not confirm, please explain.
- b. Assuming fees are insufficient to cover the cost of providing box service, please confirm that it makes sense to limit post office box availability and to maintain large waiting lists. If you do not confirm, please explain.
- c. Please describe the policy changes, and the timing of such changes, regarding the installation of new box sections to meet customer demand, assuming adoption of the proposed non-resident fee.

OCA/USPS-T7-24. Refer to page 25, lines 6-8, of your testimony. Please explain at what level of postal management the decision to expand post office box service is made.

OCA/USPS-T7-25. Refer to page 4, the continuation of Table I, lines 34-36, concerning the caller service fee for Delivery Group II. Please explain in detail the basis for the "estimated 80 percent paying the current size 5 box fee and an estimated 20 percent paying the current subgroup IC caller service fee." Show

the derivation of these percentage figures. Provide all underlying sources.

OCA/USPS-T7-26. Refer to page 25, lines 3-5, of your testimony.

- a. Please provide statistical data, reports, or other documentation on the number of residents "unable to obtain boxes in their own delivery area", or in the alternative, by Delivery Group.
- b. Please provide statistical data, reports, or other documentation on the number of non-residents seeking to obtain post office boxes service by Delivery Group, or in the alternative, by post office (including ZIP Code).
- c. If you are unable to provide the information requested in "a" and "b" above, please state whether you believe the number of residents unable to obtain boxes in their own delivery area is greater than the number of non-residents seeking to obtain post office boxes service.

OCA/USPS-T7-27. Refer to your response to OCA/USPS-T7-10.

- a. Please confirm that there are no restrictions in the DMM or DMCS that would prevent the Postal Service from giving priority to residents. If you do not confirm, please explain.

- b. Please confirm that non-residents displaced by residents who receive priority in box rentals would continue to make a revenue contribution to the Postal Service, to the extent such non-residents obtain box service at another post office. If you do not confirm, please explain.
- c. Please explain the basis of your conclusion that, "determining when to give priority to residents would appear to be very burdensome."
- d. Please explain whether the administrative burden of giving priority to residents would be greater or less than the administrative burden now associated with box rentals to non-residents.
- e. Please explain whether giving priority to residents could be achieved by establishing, where necessary, two separate lists: one for residents and the second for non-residents, both maintained in the chronological order of the request for box service.
- f. Assuming priority is given to residents over non-residents, please estimate the number of non-resident post office box customers who would not obtain post office box service.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.

*Shelley Dreifuss*  
SHELLEY DREIFUSS  
Attorney

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